

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 TARA AMIN  
4 Assistant United States Attorney  
5 501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

6 AMANDA N. LISKAMM  
7 Director  
RACHAEL L. DOUD  
8 Assistant Director  
ANDREW K. CRAWFORD  
9 FRANCISCO L. UNGER  
Trial Attorneys  
10 Consumer Protection Branch  
Civil Division  
U.S. Department of Justice  
11 450 5th Street, NW  
Washington, DC 20530  
Telephone: (202) 451-7301  
Email: andrew.k.crawford@usdoj.gov

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15 Attorneys for Plaintiff United States of America

16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 CB SURETY, LLC, et al.,

22 Defendants.

Civil Case No. 2:23-cv-02812-TLN-DB

AFFIDAVIT OF ANDREW K.  
CRAWFORD IN SUPPORT OF THE  
UNITED STATES' MOTION A DEFAULT  
JUDGMENT AGAINST DEFENDANTS  
TRAVIS SMITH, STEPHEN  
CHRISTOPHER, BRYAN BASS, CB  
SURETY LLC, PEAK BAKERY LLC, KP  
TESTING, LLC, MOTION MEDIA  
MARKETING INC., SJC FINANCIAL  
SERVICES INC., BASS BUSINESS  
CONSULTANTS, AND THINK  
PROCESSING LLC

1  
2 I, Andrew K. Crawford, hereby declare:

3       1. I am a Trial Attorney with the U.S. Department of Justice's Civil Division,  
4 Consumer Protection Branch, and I am a counsel in this matter for Plaintiff the United States of  
5 America. Unless indicated otherwise, I have personal knowledge of the facts stated herein, and if  
6 called as a witness, would competently testify thereto.

7       2. This affidavit is offered in support of Plaintiff's Request for Entry of Default  
8 Judgment against Defendants Travis Smith, Stephen Christopher, Bryan Bass, CB Surety LLC,  
9 Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc.,  
10 Bass Business Consultants, and Think Processing LLC.

11      3. On December 1, 2023, the United States filed its Complaint (ECF No. 1).  
12 Pursuant to Rule 4 of the Federal Rules of Civil Procedure, the United States served the  
13 Summons (ECF No. 12), Complaint, and the Initial Pretrial Scheduling Order (ECF No. 13) on  
14 Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP Testing,  
15 LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing LLC.

16      4. Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the  
17 aforementioned Defendants had 21 days to answer or otherwise respond to the Complaint.

18      5. On January 26, 2024, pursuant to Rule 4(d) of the Federal Rules of Civil  
19 Procedure, the United States sent a request to waive service to Defendant Bryan Bass,  
20 individually, and in his capacity as a director of Defendant Bass Business Consultants. On  
21 January 31, 2024, Defendant Bryan Bass signed the waiver of service of behalf of himself (ECF  
22 No. 73) and on behalf of Defendant Bass Business Consultants (ECF No. 74).

23      6. Pursuant to Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
24 Defendants Bryan Bass and Bass Business Consultants had 90 days to answer or otherwise  
25 respond to the Complaint. Therefore, an answer or response to the Complaint was due on or  
26 before April 25, 2024.  
27

1       7. The below table sets forth the date on which each of these Defendants was served,  
 2 the docket number of the corresponding filing proving service, and the date on which each  
 3 Defendant's response to the Complaint was due.

<b>Defendant</b>	<b>Service Date</b>	<b>Docket No.</b>	<b>Response Due</b>
Travis Smith	1/4/24	ECF No. 54	1/25/24
Stephen Christopher	1/5/24	ECF No. 50	1/26/24
CB Surety LLC	12/27/23	ECF No. 48	1/17/24
Peak Bakery LLC	12/27/23	ECF No. 49	1/17/24
KP Testing LLC	1/10/24	ECF No. 53	1/31/24
Motion Media Marketing Inc.	1/5/24	ECF No. 51	1/26/24
SJC Financial Services Inc.	1/5/24	ECF No. 52	1/26/24
Think Processing	1/10/24	ECF No. 55	1/31/24
Bryan Bass	1/26/24	ECF No. 73	4/25/24
Bass Business Consultants	1/26/24	ECF No. 74	4/25/24

11       8. On February 8, 2024, pursuant to Rule 55(b)(1) of the Federal Rules of Civil  
 12 Procedure, the United States filed a request for an entry of a default by the Clerk as to  
 13 Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP Testing,  
 14 LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing LLC  
 15 (ECF No. 64).

16       9. On February 15, 2024, the Clerk of Court filed its certificate of entry of default as  
 17 to Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP  
 18 Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing  
 19 LLC (ECF No. 65).

20       10. On May 10, 2024, pursuant to Rule 55(b)(1) of the Federal Rules of Civil  
 21 Procedure, the United States filed a request for an entry of a default by the Clerk as to  
 22 Defendants Bryan Bass and Bass Business Consultants (ECF No. 75).

23       11. On May 22, 2024, the Clerk of Court filed its certificate of entry of default as to  
 24 Defendants Bryan Bass and Bass Business Consultants (ECF No. 77).

1       12. As of the date of this Affidavit, the United States has not received an answer or  
2 other response from any of the above-listed Defendants, nor is there record of an answer or  
3 response entered on the Court's electronic docket.

4       13. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the  
5 foregoing is true and correct to the best of my knowledge and belief.

6                   Executed on July 25, 2024, in Washington, DC.

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9                   ANDREW K. CRAWFORD  
10                  Trial Attorney  
11                  Consumer Protection Branch  
12                  United States Department of Justice  
13                  Attorney for Plaintiff United States